

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
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Chapter 13 Standing Trustee

IN RE:
PAUL DOLENGO

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Case No.: 23-20473RG

HEARING DATE: 05/01/2024 at 10:00 AM

**TRUSTEE'S OBJECTION TO DEBTOR(S) MOTION TO APPROVE POST-PETITION
FUNDING**

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor(s) Motion to Approve Post-Petition Funding, respectfully objects as follows:

- There is no certification of explanation by the debtor. How the funds are intended to be used should be explicitly clarified.
- A copy of the check, receipt of same and transfer into the debtor's account should be docketed with the appropriate redactions.
- The Motion and proposed form of order refers to this transaction as post-petition funding, yet, there is no clarification on what it is the gift will fund. A review of the Modified Plan is not helpful in this regard.
- While the Modified Plan is now docketed, it also lacks clarity. The modified plan indicates both that there will be a cure of arrears and that there will be a sale of the primary residence. Part 4a is blank and thus, no cure is intended, notwithstanding Part 1b verbiage. The treatment of creditors in 4g have no relation to the claim amounts themselves. Page 1 check box indicates a cram down, but Part 7 is blank. Six creditors filed secured claims, only 3 are mentioned in the plan. The plan payments themselves are insufficient to pay the priority claim of the State of New Jersey.

Wherefore, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that the Debtor(s) Motion to Approve Post-Petition Funding in its present form be denied.

Dated: April 01, 2024

By: /S/Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire
Chapter 13 Standing Trustee